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*Attorneys for Defendant Epic Systems Corporation*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

CureIS Healthcare, Inc.,

Plaintiff,

v.

Epic Systems Corporation,

Defendant.

Case No.: 3:25-cv-04108-MMC

**DEFENDANT EPIC SYSTEMS  
CORPORATION'S OPPOSITION TO  
PLAINTIFF CUREIS HEALTHCARE,  
INC.'S ADMINISTRATIVE MOTION FOR  
LEAVE TO FILE UNDER SEAL  
PORTIONS OF PLAINTIFF'S  
OPPOSITION TO DEFENDANT'S  
MOTION TO TRANSFER VENUE**

Judge: Hon. Maxine M. Chesney

1 Pursuant to Civil Local Rules 7-11(b) and 79-5(c), Defendant Epic Systems Corporation  
2 (“Epic”) files this Opposition to Plaintiff CureIS Healthcare, Inc.’s (“CureIS”) Administrative  
3 Motion for Leave to File Under Seal Portions of Plaintiff’s Opposition to Defendant’s Motion to  
4 Transfer Venue (Dkt. No. 29 (“CureIS’s Second Administrative Motion”).

5 CureIS’s Second Administrative Motion is predicated on the same arguments set forth in  
6 its Administrative Motion for Leave to File Under Seal Portions of Plaintiff’s Complaint. (*See*  
7 Dkt. No. 2 (“First Administrative Motion”).) Accordingly, Epic incorporates by reference the  
8 arguments made in its Notice of Motion and Motion to Partially Unseal CureIS’s Complaint.  
9 (*See* Dkt. No. 25 (“Motion to Unseal”).) Specifically, the customer-identifying information<sup>1</sup>  
10 described in CureIS’s Second Administrative Motion should not be redacted as CureIS has failed  
11 to establish compelling reasons supporting redaction, including because (i) CureIS itself  
12 affirmatively publicly disclosed the existence of customer relationships for many years on its  
13 own website and elsewhere to market its products and services (*id.* at 7-8), and (ii) CureIS has  
14 not advanced particularized reasons supported by facts sufficient to meet its burden to justify  
15 sealing (*id.* at 8-12). In addition, there is a strong public interest in this matter that would be best  
16 served by disclosing the names of the customers at the center of CureIS’s allegations so that the  
17 public can assess the veracity of each party’s allegations and arguments (*id.* at 12-13).

18 Except as to the names of non-party employees, CureIS’s Second Administrative Motion  
19 should be denied, and the customer-identifying information presently redacted in CureIS’s  
20 Opposition to Epic’s Motion to Transfer Venue to the Western District of Wisconsin Pursuant to  
21 28 U.S.C. § 1404(a) (Dkt. No. 28) should be unsealed.

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23  
24  
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26  
27 <sup>1</sup> As explained in Epic’s Motion to Unseal, Epic does not contest sealing of the names of  
28 non-party employees. (Motion to Unseal at 4 n.3.)

1 Dated: July 7, 2025

Respectfully submitted,

2 By: /s/ Lauren A. Moskowitz

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